

# Exhibit 1

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL LEAGUE  
PLAYERS' CONCUSSION INJURY  
LITIGATION

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THIS DOCUMENT RELATES TO:

ALL ACTIONS

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: No. 2:12-md-02323-AB  
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MDL No. 2323

Hon. Anita B. Brody

**DECLARATION OF ORRAN L. BROWN, SR.**

I, ORRAN L. BROWN, SR., hereby declare and state as follows:

1. My name is Orran L. Brown, Sr. I am the Chairman and a founding partner of BrownGreer PLC ("BrownGreer"), located at 250 Rocketts Way, Richmond, Virginia 23231.

2. I am over the age of 21. The matters set forth in this Declaration are based upon my personal knowledge and information.

3. I submit this Declaration to describe two Opt Out revocation requests that BrownGreer, as the Claims Administrator under the Class Action Settlement Agreement in this action ("Settlement Agreement"), received on August 30, 2016 and September 13, 2016.

4. In its April 22, 2015 Final Approval Order and Judgment, the Court directed the Claims Administrator to post a list of Opt Outs as of that date. Accordingly, we posted on the official Settlement website a list of the 175 Opt Outs that were timely and included all elements required for a valid Opt Out under Section 14.2(a) of the Settlement Agreement (the "Opt Out List"), and a list of the 33 Opt Outs that were untimely and/or were missing one or more of Section 14.2(a)'s required elements. Section 14.2(c) of the Settlement Agreement

provides that a Class Member who had opted out but wished to revoke that Opt Out could submit a written request to do so “[p]rior to the Final Approval Date.”

5. After the April 22, 2015 Final Approval Date, nine Class Members included on the Opt Out List as timely and complete submitted requests to revoke those Opt Outs. The Parties to the Settlement Agreement agreed to accept those revocation requests, subject to Court approval. The Parties and I reported the requests to the Court. By Orders of July 15, 2015 (Document 6642), December 22, 2015 (Document 6713), and January 26, 2016 (Document 6739), the Court approved the revocation requests. As a result, we no longer counted those persons as Opt Outs and on each occasion posted on the Settlement website a revised Opt Out List identifying the remaining timely and complete Opt Outs remaining after the Court’s Order, which totaled 166 after the third Order.

6. By Order of September 8, 2016 (Document 6902), the Court approved the Opt Out requests of Lewis F. Bush Sr., Lewis Bush, Jr., Danielle Bush, Dee Bush, and Makai Bush, which increased the Opt Out List to a total of 171.

7. Two Class Members on that Opt Out List of timely and complete Opt Outs have submitted requests to revoke those Opt Outs:

- (a) Thomas Rentzel: On August 30, 2016, I received by fax a revocation request from Mr. Thomas Rentzel, a copy of which (with personal information redacted) is attached as Attachment 1 to this Declaration.
- (b) Woodrow Lowe: On September 13, 2016, I received by fax a revocation request from Mr. Woodrow Lowe, a copy of which (with personal information redacted) is attached as Attachment 2 to this Declaration.

The Parties to the Settlement Agreement have agreed to accept these revocation requests, subject to Court approval. If the Court grants its approval, we will no longer count them as Opt Outs and, upon direction of the Court, and will post a revised list of Opt Outs on the Settlement website.

I, Orran L. Brown, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct. Executed on this 14<sup>th</sup> day of September, 2016.

A handwritten signature in blue ink, appearing to read "Orran L. Brown, Sr.", is positioned above a horizontal line.

Orran L. Brown, Sr.

August 12, 2016

Paul, Weiss, Rifkind, Wharton & Garrison LLP  
Attn: Brad S. Karp  
1285 Avenue of the Americas  
New York, NY 10019-6064

*Via Facsimile No.: 212-757-3990*

Seeger Weiss LLP  
Attn: Christopher A. Seeger  
77 Water Street  
New York, NY 10005

*Via Facsimile No.: 212-584-0799*

Orran L. Brown, Sr.  
Claims Administrator  
Brown Greer PLC  
250 Rocketts Way  
Richmond, VA 23231

*Via Facsimile No.: 804-521-7299*

Re: Revocation of Opt Out – Thomas Lance Rentzel

Dear Sirs:

Pursuant to Section 14.2(c) of the Class Action Settlement Agreement (As Amended) in the case styled *In Re: National Football League Players' Concussion Injury Litigation*, No. 2:12-md-02323, I, Thomas Lance Rentzel, hereby state that I wish to revoke my request to be excluded from the Settlement Class.

For your records and information, my address is \_\_\_\_\_, my phone number is \_\_\_\_\_, and my birthdate is \_\_\_\_\_. Please also provide copies of all communications to my brother (who has my power of attorney) as follows:

Christopher H. Rentzel

ATTACHMENT 1

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August 12, 2016

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Please confirm the receipt and effectiveness of this revocation.

Sincerely,

Thomas Lance Rentzel

By: 

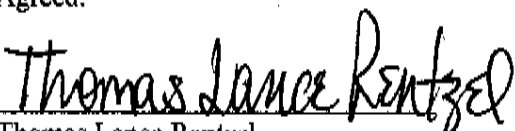
Christopher H. Rentzel, attorney-in-  
fact pursuant to the written power of  
attorney of Thomas Lance Rentzel

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August 12, 2016

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Agreed:

  
Thomas Lance Rentzel

cc: Jessica Smith

Woodrow Lowe

BrownGreer PLC - Claims Administrator  
NFL Concussion Settlement  
250 Rocketts Way  
Richmond, Va. 23231

Attention: Orran L. Brown, Sr.

Re: Request to Revoke My Timely and Proper Opt out

Name: Woodrow Lowe

Address:

Tel:

Birth:

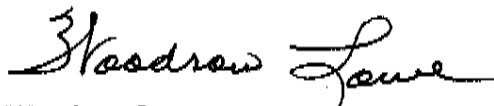
Dear Sir:

Please accept this request to revoke my timely and proper opt out which was made before the final approval date.

I wish to be restored to being a member of the class.

Thank you.

Best Regards,

A handwritten signature in black ink that reads "Woodrow Lowe". The signature is written in a cursive, flowing style.

Woodrow Lowe